

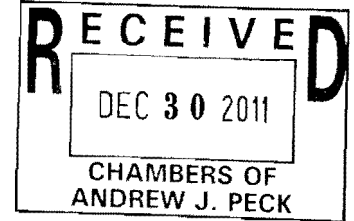
From: Sanford Wittels & Hei Fax: (646) 755-3716

To: 2128057933@rcfax.com Fax: +12128057933

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SANFORD WITTELS & HEISLER, LLP

555 Montgomery Street, Suite 1206
San Francisco, CA 94111
(415) 391-6900
Fax: (415) 391-6901
Email: jwipper@swhlegal.com
www.swhlegal.com



1666 Connecticut Ave. NW
Suite 300
Washington D.C. 20009
Fax: (202) 742-7776

440 West Street
Fort Lee, NJ 07024
Fax: (201) 585-5233

1350 Avenue of the Americas
31st Floor
New York, NY 10019
Fax: (646) 723-2948

December 30, 2011

VIA FACSIMILE

Honorable Andrew J. Peck
U.S.D.C. – Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007
Fax No. 212-805-7933

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Re: da Silva Moore, et al. v. Publicis Groupe SA, et al., Civ. No. 11-CV-1279

Dear Judge Peck,

Plaintiffs write to respectfully request that Plaintiffs' ESI experts from DOAR Litigation Consulting be permitted to attend the upcoming ESI conference scheduled for January 4, 2012. Plaintiffs require the assistance of their ESI experts to address technical issues concerning their proposed ESI protocol that may arise at the conference, including Plaintiffs' proposed search methodology using the predictive coding approach. We thank the Court for its time and consideration of this matter.

Respectfully submitted,

/s/ Janette Wipper

Janette Wipper

Cc: All counsel of record

Approved.

SO ORDERED
Andrew Jay Peck
Hon. Andrew Jay Peck
United States Magistrate Judge